

Nareshwar S. Viridi (#293715)
ACQUEST LAW
3838 Watt Avenue, Bldg. F-600
Sacramento, CA 95821
Telephone: (916) 378-0259
Facsimile: (844) 277-4734
nvirdi@acquestlaw.com

Attorneys for Plaintiff
John Brown.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JOHN BROWN,

Plaintiff,

vs.

TAKEUCHI MFG. CO. (U.S.), LTD, et al.

Defendant(s).

) Case No. 2:21-cv-00392-JAM-DMC

)
) STIPULATION AND ORDER TO EXTEND
) DEADLINE TO FILE FIRST AMENDED
) COMPLAINT AND DEFENDANTS'
) RESPONSIVE PLEADINGS;
) DECLARATION OF NARESHWAR VIRDI

) Action Filed: March 3, 2021

WHEREAS, on AUGUST 23, 2021, the Court issued an order granting UNITED
RENTALS Motion to Dismiss and TAKEUCHI'S Motion to Dismiss;

WHEREAS, pursuant to the August 23, 2021 order, the Court permitted Plaintiff JOHN
BROWN to file a First Amended Complaint within twenty days (20) of the date of its order. The
current deadline to file a First Amended Complaint is September 13, 2021;

WHEREAS, Defendants' responsive pleadings would be due twenty days (20) thereafter;

WHEREAS, Plaintiff's Counsel has been sick with pneumonia and covid and has not
been attending office since the beginning of August 2021.

WHEREAS, Plaintiff's counsel NARESHWAR VIRDI expects to be back in office by September 17, 2021.

WHEREAS, the Plaintiff and Defendants have met and conferred regarding the deadlines provided in the Court order;

WHEREAS, the Plaintiff and Defendants are requesting the Court to amend its August 23, 2021 order to provide additional time to the Plaintiff to file a First Amended Complaint.

ACCORDINGLY, IT IS SO STIPULATED, by and between the parties and through their counsel, as follows:

1. Plaintiff's deadline to file a First Amended Complaint be extended to October 1, 2021;
2. Defendants' responsive pleadings to be due twenty days (20) thereafter.

Dated: September 9, 2021

ACQUEST LAW

/S/ Nareshwar Singh Virdi

Nareshwar S. Virdi
Attorneys for Plaintiff
John Brown

Dated: September 9, 2021

BOWMAN and BROOKE LLP

/S/ Neil Kliebenstein

Neil M. Kliebenstein
Attorneys for Defendants
Takeuchi Mfg. Co. (USA) Ltd.

Dated: September 9, 2021

GORDON & REES LLP

/S/ Russell M. Mortyn

Russell M. Mortyn
Attorneys for Defendants
United Rentals (North America) Inc.

IT IS SO ORDERED.

Dated: September 10, 2021

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
UNITED STATES DISTRICT COURT JUDGE

DECLARATION OF NARESHWAR VIRDI

1. I am the attorney of record for the Plaintiff in this matter;
2. I am licensed to practice in the State of California. My California State Bar Number is 293715.
3. Since the beginning of August 2021, I have been sick with fever, chills, uncontrollable cough, and body aches.
4. The treating physicians have diagnosed me with Pneumonitis, Walking Pneumonia, and Covid infection.
5. Because of these health issues, I have not been able to attend my office.
6. I expect to start attending office by September 17, 2021.

I certify, under the penalty of perjury, that the above statements in my declaration are true and correct to the best of my knowledge.

September 9, 2021

/S/ Nareshwar Singh Virdi
Nareshwar S. Virdi